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STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
AND ENVIRONMENTAL CONTROL
DIVISION OF AIR AND WASTE MANAGEMENT

WASTE MANAGEMENT SECTION
SUPERFUND BRANCH

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October 2, 1992

Mr. Randy Sturgeon (3HW42)
U.S. EPA, Region III
841 Chestnut Building
Philadelphia, PA 19107

RE: Comments on Revised Draft (9/29/92) Proposed Plan
DuPont Newport Superfund Site
Newport, New Castle County, Delaware

Dear Mr. Sturgeon:

Enclosed are DNREC's comments on the revised draft (9/29/92) of the Proposed Plan for the Dupont Newport Superfund site. These comments are based on reviews of the document and our telephone conversation of September 29, 1992.

EPA and DNREC appear to be much closer to a complete understanding of the draft Proposed Plan than before. However, a few issues remain to be resolved. Please contact me at (302) 323-4540 on Monday, October 5, 1992 for further discussion of these comments.

Sincerely,

Anne V. Hiller
Environmental Scientist III
Superfund Branch

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Enclosure

pc: N. V. Raman
K. Kalbacher
P. Ludzia (3HW42)

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**COMMENTS ON REVISED DRAFT PROPOSED PLAN
DUPONT NEWPORT SUPERFUND SITE**

- It appears to DNREC after review of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and consideration of the Proposed Plan and other site documents, that contaminated groundwater at the site is a principal threat and should be identified as such in the draft Proposed Plan. This principal threat does not appear to be adequately addressed on the south side of the Christina River in the draft Proposed Plan. DNREC currently does not agree with the draft Proposed Plan's recommendation for simply monitoring of the Potomac Formation and Columbia Formation aquifers. DNREC understands and agrees with the concerns that active treatment of the Potomac Formation groundwater may lead to an increase in contamination levels in this aquifer. However, DNREC believes that alternatives to remediate the Columbia Formation aquifer should be more carefully considered. Treatment of the Columbia Formation aquifer will help reduce subsequent contamination to the Potomac Formation aquifer.
- DNREC perceives a troubling contradiction between the revised draft Proposed Plan's arguments for wetland remediation and rejection of Columbia Formation groundwater remediation on the south side of the Christina River. According to our meeting of 9/21/92 regarding the development of EPA's sediment cleanup criteria, those cleanup criteria were developed with the assumption that although the south wetland area is contaminated with elevated levels of site related contaminants certain portions do not require remediation because the sediment toxicity and benthic diversity tests showed little impact occurring in these areas. However, the draft proposed Plan rejects the alternative for treatment of Columbia Formation groundwater on the basis that treatment may cause the wetlands to become a recharge area instead of a discharge area and that the recharge may cause recontamination of the groundwater. The contradiction is this: When remediating the wetlands the contamination levels in certain areas are considered to be low enough to be allowed to be left in place. However, when considering treatment of Columbia Formation groundwater, those same contamination levels are considered to be too high to allow discharge of treated water into those areas, because of concerns for recontamination. This contradiction needs to be addressed. DNREC would like to discuss this issue with EPA in more detail in Monday Oct. 5, 1992.
- On pg. 5 of the draft Proposed Plan, the statement is made that treatment of the currently identified principal threats is believed to be impracticable. Treatment of the south landfill and sediments from the north drainage way are both proposed in the document. Please resolve this issue.
- It appears to DNREC that the revised draft Proposed Plan does not include a summary of the support agency's formal comments as called for in the NCP.
- Please notify DNREC as soon as possible of the normalized values for EPA's sediment cleanup criteria levels. It is DNREC's understanding that the values currently stated in the Proposed Plan are not normalized.
- DNREC understands, as a result of our telephone conversation on 9/29/92, that the wetlands monitoring called for in the draft Proposed Plan will include both the unremediated and remediated areas of both the north and south wetlands.
- On pg. 19 of the draft Proposed Plan, the statement is made that stabilizing the waste in the south landfill would reduce its toxicity. The Focused Feasibility Study prepared by Woodward Clyde Consultants states that stabilization of the south landfill waste would not reduce the toxicity. Please resolve this contradiction.

- As a result of our telephone conversation of 9/29/92, the word "parameters" in the last paragraph of pg. 12 will be changed to "conditions".
- Please add "ARAR" and "present worth cost" to the glossary of terms for the document.
- As we discussed on 9/29/92, please change references to Basin Road in the Proposed Plan to Old Airport Road. Basin Road is a commonly used term for parts of State Route 141. Signs on Rt. 141 for S. James Street-Basin Road-Old Airport Road only refer to S. James Street or Old Airport Road. The use of the term Basin Road may give the impression that Rt. 141 is built over the eastern edge of the south landfill and will be involved in the remediation activities.
- As we agreed in our telephone conversation of 9/29/92, the summary statement regarding EPA's preferred alternative for the Christina River will be changed from capping to dredging; and the dates for the public comment period and public meeting will be changed to reflect the issuance of the Proposed Plan to the public.

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